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June 19, 2015

**VIA E-MAIL TRANSMISSION  
AND ECF FILING**

The Honorable Robert E. Gerber  
United States Bankruptcy Judge  
United States Bankruptcy Court  
Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green  
New York, New York 10004

**Re: In re Motors Liquidation Company, et al.  
Case No. 09-50026 (REG)**

**Letter Regarding Update on Related Proceedings**

Dear Judge Gerber:

King & Spalding LLP is co-counsel with Kirkland & Ellis LLP for General Motors LLC (“**New GM**”) in the above-referenced matter. Pursuant to Your Honor’s Endorsed Order dated May 5, 2015 [Dkt. No. 13131], we write to update the Court regarding developments in proceedings relating to New GM’s Motions to Enforce. Specifically, on June 18, 2015, New GM was served with *Celestine Elliott’s, Lawrence Elliott’s, and Berenice Summerville’s Petition for Permission to Appeal a Judgment and Associated Orders of the Bankruptcy Court* (“**Elliott Petition**”). A copy of the Elliott Petition is attached hereto as Exhibit “1.” In addition, today, June 19, 2015, counsel to New GM and Lead and Liaison Counsel filed a joint letter (“**Joint Letter**”) addressed to Judge Furman to advise on matters of possible significance in proceedings related to MDL 2543, which includes an update on the status of this bankruptcy case. A copy of

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the Joint Letter, without exhibits,<sup>1</sup> is attached hereto as Exhibit “2.”

Respectfully submitted,

*/s/ Arthur Steinberg*

Arthur Steinberg

AJS/sd  
Encl.

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<sup>1</sup> There are 24 exhibits annexed to the Joint Letter, most of which are documents that have previously been filed with this Court; the other documents do not appear relevant to this bankruptcy case. To the extent the Court believes the exhibits should be filed, New GM will do so promptly.